

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: : Chapter 13 Bankruptcy  
: :  
REED W. WILLIS, JR. : No. 1:25-bk-00821-HWV  
: :  
Debtor : Electronically Filed Document

**ENTRY OF APPEARANCE AND REQUEST FOR NOTICES**

TO: CLERK, UNITED STATES BANKRUPTCY COURT

PLEASE NOTE that pursuant to Bankruptcy Rule 9010(b), the Attorney General of Pennsylvania, as counsel for the Commonwealth of Pennsylvania, Department of Revenue, a party in interest within the intent of the United States Bankruptcy Code, and request, pursuant to Bankruptcy Rule 2002(g), that all notices, given or required to be given and all papers served or required to be served in the above-captioned case be given to and served upon the following at the office, address and telephone number set forth below, and that the person and address set forth below be added to the official address matrix in this proceeding by the Clerk of Court:

**Kelly M. Appleyard**  
**Deputy Attorney General**  
**Office of Attorney General**  
**15<sup>th</sup> Floor, Strawberry Square**  
**Harrisburg, PA 17101**  
**Telephone 717-497-8758**  
**[kappleyard@attorneygeneral.gov](mailto:kappleyard@attorneygeneral.gov)**

It is further requested that in furtherance of its right to be heard, as provided in 11 U.S.C. §1109(b) of the Bankruptcy Code, and in addition to the notices referred to in Bankruptcy Rules 2002, 2015, 6007, 9007 and 9022, the above-designated person to be served, as stated above, with copies of all notices, correspondence, orders, applications, motions, petitions or pleadings, requests, complaints or demands, whether formal or informal, or any other documents filed with

this Court that would affect, to any extent, the claims, rights or interests of Commonwealth of Pennsylvania, Department of Revenue.

Nothing in this pleading is intended to waive the Commonwealth of Pennsylvania's or its officials' immunity from suit in a Federal Court under the Eleventh Amendment of the United States Constitution.

DATE: May 1, 2025

Respectfully submitted,

DAVID W. SUNDAY, JR.  
ATTORNEY GENERAL

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BY: /s/ Kelly M. Appleyard  
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Deputy Attorney General  
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